

PART 2 INDEPENDENT GROUPS

Chapter 14: Christian Coalition

Although the Christian Coalition (“Coalition”) holds itself out as a nonpartisan, “social welfare” organization, compelling evidence suggests that the Coalition functions primarily as a political committee by endorsing and supporting Republican candidates on the local, state, and federal levels. The Coalition has admitted spending at least \$22 million on 1996 federal races and distributing about 45 million voter guides to churches on the Sunday before election day. The information before the Committee indicates that these voter guides were manipulated to advance Republican candidates. The Federal Election Commission, in an ongoing federal lawsuit, alleges that for three election cycles, the Coalition has illegally coordinated its efforts with Republicans.

FINDING

Although the Christian Coalition has applied for status as a 501(c)(4) organization and claims to be a nonpartisan, social welfare organization, the evidence before the Committee suggests that the Christian Coalition is a partisan political organization operating in support of Republican Party candidates. The evidence of partisan activity includes: spending at least \$22 million on the 1996 elections; distributing 45 million voter guides manipulated to favor Republican candidates; and endorsing Republican candidates at organization meetings.

BACKGROUND

The Christian Coalition (“Coalition”) came to the Committee’s attention for several reasons. First, in July 1996, the Federal Election Commission (“FEC”) filed suit against the Coalition alleging that the Coalition had coordinated expenditures during the 1990, 1992 and 1994 election cycles with Republican House, Senate and Presidential candidates and their campaigns in violation of federal election law.¹ That suit is ongoing. Second, the Internal Revenue Service continued for a seventh year to delay making a final decision regarding the Coalition’s application for tax-exempt status as a social welfare organization. Third, numerous Democratic candidates complained publicly that, in the 1994 and 1996 cycles, the Coalition had distorted their positions on issues in order to favor their Republican opponents, suggesting that the Coalition was not educating voters on candidate positions, but playing a partisan role in federal elections.

On March 3, 1997, the Minority requested that a Committee subpoena be issued to the Christian Coalition for the production of documents. The Majority, however, declined to include the Coalition in the group of subpoenas issued in March 1997.² After significant effort by the Minority, the Coalition was included in a group of Committee subpoenas issued on July 30.³ However, in response to the July 30 subpoena, the Coalition produced only a few documents,

thereby significantly restricting the Committee's ability to investigate possible abuses. The Coalition then joined 25 other nonprofit groups in refusing to comply with Committee subpoenas. Among the defiant entities were the National Right to Life Committee, Citizens Against Government Waste, Citizen Action, and the AFL-CIO. The groups objected to the subpoenas on the ground that they "pose[d] a substantial threat to free speech, free association and privacy rights and the rights of other parties to have confidential communications with them."⁴ The subpoena directed to the Coalition, however, did not seek membership or donor lists, but sought only to discover if the Coalition had violated campaign laws by coordinating with candidates or parties. Investigation of the Coalition was also hindered by the Majority's refusal to issue deposition subpoenas to key Coalition personnel who could have provided indispensable insight into Coalition activities.

Despite these obstacles, the Minority was able to pursue its investigation by reviewing FEC documents, federal court records, a limited number of Christian Coalition and RNC documents and publications, and by conducting interviews. Although severely restricted by the lack of cooperation by the Coalition, the RNC and the Dole campaign, the Minority was able to uncover much improper and possibly illegal campaign activity by the Coalition.

The evidence before the Committee indicates that the Coalition functions primarily as a partisan political committee, rather than a social welfare organization, because it endorses and supports Republican candidates on the local, state, and federal levels. The Coalition's election-related activities range from the distortion of candidate positions and the manipulation of issues in Coalition voter guides, to the outright endorsement of candidates at caucus meetings. The actions of the Coalition indicate that its major purpose is the election of Republican candidates to public office, and the Coalition should therefore be required to register with the FEC as a political committee subject to the FEC's reporting and disclosure requirements, in conformance with federal election law. While the investigation focused on the 1996 campaign, it is critical to place the Coalition's activities in the context of nearly a decade of partisan political activity.

PAT ROBERTSON AND RALPH REED

The Christian Coalition was established in 1989. The president and founder of the Coalition is the Rev. Marion G. ("Pat") Robertson. The executive director from 1989 until 1997 was Ralph Reed. Both men have ongoing close ties to the Republican Party. In 1988, Robertson campaigned to win the Republican nomination for the presidency.⁵ Ultimately, the Republican nomination was won by Vice President George Bush, who went on to win the general election in November. At Bush's inauguration in January 1989, Robertson first met Reed, then a young Republican activist.

Reed had a great deal of political experience.⁶ While attending college, he was elected chairman of the College Republican National Committee, part of the Republican National Committee ("RNC"). He worked closely with Grover Norquist, director of the National College Republican Committee, who went on to become a GOP activist in his own right as president of Americans for Tax Reform.⁷ From 1982 to 1984, Reed worked directly for the RNC. In 1984,

Reed was active in voter registration efforts for Republican Senator Jesse Helms of North Carolina, and was a founding member of a political-training group for young conservatives, Students for America. Reed also worked on Georgia Republican Matt Mattingly's successful Senate campaign, later serving in Washington as a summer intern in Mattingly's office. In 1988, he worked on Jack Kemp's presidential campaign.

At their January 1989 meeting, Robertson discussed with Reed his plans for the creation of a new political organization.⁸ Robertson saw a political vacuum being created on the religious right as the Rev. Jerry Falwell's Moral Majority lost influence. Impressed with Reed's experience and his perspective on "building bridges" within the Republican Party, Robertson asked Reed to join him in constructing the new organization. Although Reed initially declined because he was pursuing a doctorate degree at Emory University, he reconsidered and accepted Robertson's offer to work for him on the new venture, the Christian Coalition.

In the summer of 1990, officials of the National Republican Senatorial Committee ("NRSC"), a division of the RNC, apparently requested a meeting with the Coalition and offered to contribute start-up funds.⁹ The NRSC provided the Coalition with about \$64,000 in seed money. The Coalition also purchased a mailing list and office equipment from Robertson's presidential campaign.¹⁰

In spite of Reed's Republican political experience, Robertson's ties to the Republican Party, and the infusion of start-up funds from the RNC, the Coalition did not organize itself as a political committee under federal law. Instead, it applied for 501(c)(4) tax-exempt status as a "social welfare organization." Such organizations are defined as:

Civic leagues or organizations not organized for profit but operated exclusively for the promotion of social welfare. . . the net earnings of which are devoted exclusively to charitable, educational, or recreational purposes.¹¹

While contributions to 501(c)(4) organizations are not tax deductible, such organizations are exempt from paying taxes. In addition, there are few restrictions on the entity's freedom to lobby or influence legislation.¹² An organization which has 501(c)(4) status also may engage in campaign activities, so long as its primary activities promote social welfare and its activities are nonpartisan.¹³ The evidence indicates, however, that the Coalition has engaged primarily in partisan campaign activities in disregard of the tax code's restrictions on section 501(c)(4) organizations.

CHRISTIAN COALITION VOTER GUIDES

Much of the controversy concerning the Coalition's election-related activity has centered on the printing and distribution of so-called voter guides. The voter guides typically list five to ten issues and reflect the opposing candidates' positions as either "supports" or "opposes." Among issues frequently listed are "Balanced Budget Amendment," "Term Limits For Congress," "Homosexuals in the Military," and "Repeal of the Federal Firearm Ban."¹⁴ The voter guides are distributed in selected Christian churches the weekend prior to an election and seek to provide

information that the targeted voters will rely upon in casting their ballots.¹⁵ The evidence indicates that the Coalition often manipulates and distorts the candidates' positions, thereby providing the voters with incomplete or inaccurate information concerning the candidates.

The Committee's subpoena required the Christian Coalition to produce its voter guides for the 1996 campaign. Even though these guides were widely distributed in numerous states and districts nationally, the Coalition maintained that the guides were privileged under the First Amendment -- a patently absurd proposition.¹⁶ Despite this obstruction by the Coalition, the Minority was able to obtain a number of voter guides distributed in elections around the country.

Voter Guides Before 1996 Election Cycle

The use and misuse of information included in the voter guides and the manipulation of issues to frame positions to favor the Coalition's preferred candidate over another candidate were reported by Larry Sabato, a professor at the University of Virginia, and Glenn Simpson, an investigative journalist, in their 1996 book, Dirty Little Secrets : The Persistence of Corruption in American Politics. Sabato and Simpson reviewed approximately 200 voter guides distributed to churches and others by the Coalition in 1994 and concluded that the guides "give every appearance of having been designed with the explicit intention of influencing voter decisions in favor of Republicans."¹⁷ The authors based their conclusion on the following observations:

- O There was distortion of issues in the voter guides. This distortion was illustrated by a surprising lack of agreement between the positions of Republicans and Democrats on issues mentioned in the Coalition voter guides. In 73 percent of the Senate race voter guides and 74 percent of the House race voter guides reviewed by the authors, the nominees were shown to agree on nothing, which is unusual, even for candidates from different parties. The authors concluded, "The reason candidates were portrayed as being in almost total conflict was that the coalition manipulated the content of the guides, changing the issues from race to race."¹⁸ This form of distortion was designed to create a stark contrast between Democratic and Republican candidates.
- O There was selective placement of issues in the voter guides. In almost every voter guide examined in the study, the first issue the Coalition listed was "Raising Federal Income Taxes," while the last was often "term limits," issues that do not have an obvious religious component. The authors observed that, "A longstanding dictum of marketing science holds that in printed messages, the first thing and the last thing in a list are the ones best remembered." The authors further observed that Republican candidates were almost always listed as opposed to raising income taxes and supporting term limits, while Democrats were almost always portrayed as having the opposite position.¹⁹

Supporting Simpson and Sabato's conclusions, many candidates for federal office have complained about the distortion of their positions as portrayed in the Coalition's voter guides.

The distortions cover a wide variety of issues, but were often tied to the key issues in an individual race. Candidate complaints have ranged from the distortion of issues through the use of inflammatory language to the outright misrepresentation of a candidate's position on such issues as the proposed balanced budget amendment to the Constitution.

- O A compelling example of Coalition distortions occurred in the 10th Congressional District in Indiana. The Coalition's 1994 voter guide indicates that Democratic Representative Andy Jacobs opposed a balanced budget amendment, while his opponent favored it. However, Representative Jacobs was a supporter of a balanced budget amendment and has stated, "I personally started that [balanced budget] movement back in 1976." The voter guide also listed him as giving "no response" on the term limits for Congress issue, thereby giving the false impression that he had responded to the other questions. According to Representative Jacobs, he had not responded to any portion of the Coalition's questionnaire.²⁰
- O In Texas, Representative Martin Frost was not only a victim of distortions of his record, but issues of interest to Coalition members that he supported were omitted from the Coalition's 1994 voter guide. Frost noted, "I voted in favor of a constitutional amendment requiring a balanced federal budget, and yet the guide falsely states that I opposed a balanced budget constitutional amendment. . . I have consistently voted in favor of voluntary school prayer and in favor of the right of parents to home-school their children, and yet those votes are not even mentioned in the guide."²¹
- O Another example is the 1994 Senate race in Virginia between the Democratic incumbent Charles Robb and Oliver North. The Coalition's voter guide stated that Senator Robb favored banning ownership of legal firearms. According to Senator Robb, "I have not attempted to ban the ownership of legal firearms at all. I did vote to change the law with respect to some combat assault weapons, and the law would then require that those particular weapons not be owned, produced, whatever the case may be. But nothing that is legal have I voted to ban."²²
- O Richard Fisher, a Democratic candidate for the Senate in Texas, has stated that a 1994 Coalition voter guide correctly listed his opposition to educational vouchers and his support of abortion rights. However, although he had repeatedly stated his support for term limits, a balanced budget and a line-item veto for the President, the guide reflected Fisher's answers to those questions as "no response."²³

In her book analyzing the 1996 elections, Elizabeth Drew wrote: "[T]he idea that the Coalition didn't prefer particular candidates was a fiction. It had a clear preference in most of the competitive races; the voter guides left no doubt as to the preferred candidate. The guides have been found to vary from district to district or state to state in the issues they raised, enabling preferred candidates to get high scores."²⁴

Voter Guides Used During the 1996 Election Cycle

In 1996, the Coalition admitted spending at least \$22 million on the elections and working to distribute about 45 million voter guides in churches on the Sunday before election day.²⁵ A review of Coalition voter guides for many of the 1996 federal races indicates that much of what was reported earlier concerning Coalition abuses in the 1994 elections applied to the 1996 races. For example, rather than providing a complete list of issue positions for each candidate so that voters understood the candidates' positions on each issue, different issues often appeared in voter guides in House and Senate races in the same state. Issues appeared to have been changed in an effort to favor the Coalition's preferred candidate. Examples involving the 1996 voter guides include the following.

- O In Georgia, in the Senate and 8th Congressional District races, "Abortion on Demand" was an issue listed in the Coalition's voter guides. However, that issue was replaced in Coalition voter guides for the 2nd, 4th, 10th, and 11th District races with the issue "Banning Partial Birth Abortion" and "Taxpayer Funding of Abortion."²⁶ The voter guides thus failed to provide a consistent list of issues to educate the voting public about where Georgia candidates stood on issues of concern; the voter guides instead appeared to alter the issues presented in order to present a favorable image of particular candidates in a particular race.
- O In several Coalition voter guides distributed in Iowa, a question concerning a balanced budget amendment to the Constitution was included for the presidential and congressional candidates, but did not appear in the guide for the U.S. Senate race. A possible reason the issue was omitted from the Senate voter guide is that Democratic Senator Tom Harkin had supported a balanced budget amendment, voted for it, and sent the Coalition a letter stating his position on that issue. Apparently, the Coalition chose not to inform Iowa voters of Senator Harkin's position.²⁷
- O Voter guides for the 1996 presidential race included the issue "Banning Partial Birth Abortion." The guide stated that President Clinton "Opposes" the ban. However, the President had repeatedly stated that he supports such a ban, provided that it includes an exception to protect the life and health of the woman.²⁸
- O In Alaska, as well in some other states, the issue of firearms was included in the Coalition voter guide. In the Coalition questionnaire candidates were questioned about repeal of the federal ban on semi-automatic firearms. However, the Coalition recharacterized the issue in its voter guides, using imprecise and inflammatory language such as "Repeal of the Federal Firearm Ban" on the voter guide for the at-large congressional race. The issue was phrased in the voter guide

to give the impression that the federal government had banned ownership of firearms.²⁹

- O In Massachusetts, in the 4th, 6th, 7th, 8th, and 9th Congressional Districts, candidates' positions on "Homosexuals in the Military" were listed in the Coalition's voter guides, but that issue was replaced in the 10th District voter guide with "Federal Government Control of Health Care." Again, it is unclear why the same issues were not included in all districts so that voters could compare candidates' positions, but instead issues were changed, apparently to favor one candidate over another. Also in Massachusetts, modifying language concerning the balanced budget issue was included in the voter guide regarding Representative Joe Kennedy. The guide stated that Representative Kennedy opposed the "Balanced Budget Amendment With Tax Limitations." Other voter guides reported the issue as "Balanced Budget Amendment." Apparently, the modifying language "With Tax Limitations" was included so that the Coalition could report that Representative Kennedy opposed the amendment, even though he was on record as supporting a balanced budget amendment.³⁰
- O In a 1996 California Congressional race, Walter Stoermer, a former Christian Coalition official in California, admitted that the Coalition had misrepresented in its voter guides the abortion views of a Republican candidate to make him more acceptable to pro-life voters in comparison to the Democratic candidate. Stoermer said that the 1996 Coalition voter guides portrayed Republican Representative Sonny Bono as against abortion when he actually supported abortion rights.³¹

The evidence indicates that Coalition voter guides have also been used in Republican primaries to promote candidates favored by the Coalition. Below are examples from Republican primaries in which the Coalition appeared to be favoring a particular candidate rather than simply educating the electorate about the candidates' positions.

- O On November 27, 1995, Norma Paulus, a candidate for the Senate in Oregon's Republican primary, wrote to Ralph Reed complaining that the Coalition was attempting to hide its support for another candidate and to manipulate "well-meaning church-goers seeking impartial advice" by publishing an unfair and inaccurate account of her positions in a voter guide. Paulus wrote, "For you to suggest that my positions are other than those stated in this letter is a lie. . . [I]t is outrageous and totally irresponsible of you to bear false witness in this manner." Paulus demanded, but did not receive, a retraction.³²
- O In 1997, Virginia State Senator Kenneth Stolle finished third in a Republican primary race for Attorney General. Senator Stolle, a conservative Republican, characterized the portrayal of his positions in the Coalition voter guide as "inaccurate and misleading."³³ For instance, Senator Stolle's opponents, Mark Early and Jerry Kilgore, reportedly were listed in the Coalition voter guide as

opposing off-track betting parlors, while Senator Stolle was listed as a supporter. Stolle, however, claimed to have introduced legislation to eliminate or restrict off-track betting. Senator Stolle said that the issue was not included in the Coalition's questionnaire sent to the candidates.

- O Finally, in an "open letter" to the Coalition's Pat Robertson and Ralph Reed, Republican Senator Arlen Specter of Pennsylvania alleged that the Christian Coalition had excluded him from a forum of GOP presidential contenders because he supports abortion rights:

You deny the most basic American rights -- the right to speak out and the right to be heard as you seek to dominate the political process and dictate the Republican nominee for president for 1996. . . .Who are you to impose a litmus test and exclude someone because he is the only pro-choice candidate challenging the Republican platform which denies women their constitutional right to choose?. . .Even in repressive Communist China, dissenting views are permitted at the World Conference on Women.³⁴

Senator Specter was later invited to address the Coalition's state and national leadership, but not the general session at which the other candidates were invited to speak. Senator Specter responded, "I'm entitled to equal treatment."³⁵

The study performed of the Coalition's 1994 voter guides together with the evidence obtained regarding the Coalition's 1996 voter guides indicate that the Coalition uses its voter guides, not to educate the electorate about the positions held by all candidates in a race, but rather to persuade the electorate to support particular candidates that the Coalition favors. In the vast majority of cases, these candidates have been from the Republican Party and from its most conservative wing.

COALITION OFFICIALS ENDORSED CANDIDATES

The Coalition engaged in openly partisan activity at its 1995 "Road to Victory" conference in Washington, D.C. The annual Coalition conference features appearances by invited Republican national political candidates who address the attendees regarding issues of importance to Coalition supporters. At "breakout" sessions at the meeting, state caucus groups convene to discuss local Coalition issues. Although the Coalition claims not to endorse candidates, specific Republican candidates were endorsed during state caucus meetings at the 1995 conference, according to press reports. There were also discussions of "stealth" tactics to be used to identify supporters and gain control of local Republican parties.

One example of the Coalition endorsing a candidate occurred during the South Carolina State Caucus meeting in 1995. Roberta Combs, director of the South Carolina Christian Coalition, stated that Democratic Representative John Spratt "needs to go." Combs then introduced Republican candidate Larry Bingham, and commented, "He's going to be our next

congressman in the 5th District.” Bingham stated, “Larry Bingham will score 100 on your scorecard. . .I need your help. I need your support. Roberta has given me her personal support. . .With your help, we can defeat John Spratt.” Combs seemed aware that these activities were questionable; she twice demanded that any reporters leave the room.³⁶

Similarly, at the Louisiana State Caucus meeting, Louisiana State Coalition Director Sally Campbell openly endorsed the gubernatorial candidacy of Republican State Senator Mike Foster. Campbell told attendees that Senator Foster promised her that if elected, he would call a special session of the legislature to mandate a ballot initiative against gambling. Reportedly, Senator Foster told Campbell that he could not be elected without the Coalition’s help. The national Christian Coalition, as noted above, claims that it does not endorse candidates. To avoid that ban, Campbell suggested that Coalition activists endorse candidates, but ensure that every time an endorsement appeared in print, the caveat “Affiliation given for identification purposes only” be included.³⁷

In addition to supporting candidates, in at least one state caucus meeting at the 1995 Road to Victory conference, Coalition members surreptitiously engaged in political activities. Arizona Coalition Field Director Nathan Sproul reportedly urged attendees at the Arizona Caucus meeting to become precinct committee chairs in the Republican Party, but cautioned them not to disclose to anyone that the Coalition was behind the effort. Sproul advised the attendees that the Coalition needed precinct committee chairs to elect delegates to the Republican National Convention.³⁸

At the 1996 “Road To Victory” Conference, candidates were again endorsed at individual state caucus meetings:

- O Representative David Funderburk (R-N.C.) and his wife Betty appeared at the North Carolina Caucus meeting and appealed for help in his re-election bid. At the meeting, Representative Funderburk commented, “I wouldn’t be a member of Congress if it weren’t for the work the Christian Coalition had done for me.” State Coalition Chairman Sim DiLapp advised Funderburk, “We want to do what we can for you.”³⁹
- O In the Texas Caucus meeting, Texas Coalition State Director Jeff Fisher discussed races for the state board of education and noted that one of the candidates, Rich Neill, was present in the room. Fisher advised the attendees to “forget the top of the ticket,” and focus on developing a “farm team of lower office holders.” Fisher asserted, “The Rich Neills at the bottom of the ticket are going to run for statewide offices in the future.”⁴⁰
- O In the California caucus meeting, California Coalition Chairwoman Sara DiVito Hardman cited a state legislative race in Santa Ana where “we got our guy elected” by distributing 30,000 voter guides. Hardman noted that state caucus attendance was down and attributed it to attendance at the Republican National

Convention in San Diego in August.⁴¹

- O South Carolina Coalition Director Roberta Combs commented in the South Carolina Caucus meeting on the state's U.S. Senators, Republican Strom Thurman and Democrat Ernest Hollings, stating, "Thurmond is good, Hollings is trouble." Combs stated that Senator Hollings "voted wrong" on recent bills concerning gay rights and abortion restrictions.⁴²

Ralph Reed apparently also used the Road of Victory conference to encourage general support for Republican candidates in the 1996 elections. Reed told the press at the conference:

If the Republicans hold both houses of Congress, or gain seats in either chamber, regardless of what happens in the presidential race, it will be a major statement that the religious conservative movement has arrived as a permanent and institutionally stronger player that can win victory down the ballot even when the presidential race remains uphill."⁴³

Most recently, at the 1997 Road to Victory conference held in Atlanta in September 1997, Pat Robertson, chairman of the Coalition, made remarks which cast doubt on the Coalition's position that it does not engage in activities to elect candidates. In addressing about 100 members of the Coalition's state branches, Robertson made clear his comments were not intended for the general public, "This is sort of speaking in the family. . . .If there's any press here, would you please shoot yourself? Leave. Do something."⁴⁴ Robertson spoke in detail about the need for the Coalition to increase precinct-level political efforts and suggested that the Coalition imitate Tammany Hall and other successful political machines. Robertson also commented on the Coalition's part in the Republican Party's congressional victories and control of Congress, and asserted his expectations that the Republican leaders would listen to his agenda. In discussing the Republican presidential nominee in the year 2000, Robertson said, "We have absolutely no effectiveness when the primary comes. None whatsoever. Because we have split our votes among four or five people and the other guy wins. . . . So we need to come together on somebody."⁴⁵ In an apparent reference to Vice President Gore, Robertson derided him as "ozone Al," and said that "I don't think at this time and juncture the Democrats are going to be able to take the White House unless we throw it away." He also asserted the Coalition has the "possibility" of selecting the next U.S. president.⁴⁶ By his own words, Robertson confirmed that the Coalition seeks to influence elections and establish itself as a powerful political organization, and that its goal is to elect Republicans, not Democrats.

Finally, there is considerable evidence that the Coalition expressed a preference for and worked to ensure the nomination of Senator Dole to be the Republican Party's presidential nominee in 1996. The media reported that in January 1996, Ralph Reed was "encourag[ing] county and state coalition officers to back [Senator] Dole" for the Republican nomination.⁴⁷ In March 1996, Michael McHardy, general manager of religious radio station KSIV in St. Louis, Missouri, resigned from the advisory board of the state Christian Coalition. He cited Coalition support for Senator Dole as a reason for his resignation, stating, "On the national level, they have

been working to get Bob Dole elected.” Showing any candidate preference, he said, ran counter to the Coalition’s stated purpose -- “to promote certain issues on a local level and to issue objective scorecards showing each candidate’s stances on those issues.” McHardy cited a “puff piece” on Senator Dole that appeared in the Coalition’s Christian American magazine in late February.⁴⁸ Documentation obtained by the Committee reveals that the magazine contacted the Dole campaign just before a series of crucial primaries to prepare a “full length cover article on Senator Dole” for the February edition.⁴⁹ Later, according to one election analyst, “Reed’s support for Dole would turn out to be crucial in South Carolina, where Dole dutifully attended a rally laid on by Reed, and wrapped up the nomination.”⁵⁰ In June 1996, Robertson stated, “The Christian Coalition, without it probably Bob Dole wouldn’t be the nominee.”⁵¹

The evidence indicates that the Coalition is attempting to influence the election of Republican candidates to public office and is seeking to further its political goals by building a political organization at the precinct level -- activities indicative of a political party, not a social welfare organization. These activities demonstrate that the Coalition functions primarily as a political committee and its major purpose is the nomination and election of Republican candidates to public office.

COALITION TIES TO THE REPUBLICAN PARTY

The Committee obtained a number of RNC documents which reveal close ties between the Coalition and the Republican Party, providing further evidence of the Coalition’s partisan nature. Despite Coalition assertions that it qualifies as a social welfare organization, the documents confirm that the Coalition works closely with the Republican Party.

For example, during the 1996 election cycle, the RNC supplied Republican candidates with a 29-page “Coalition Building Manual,” advising them on how to work with nonparty organizations to win election.⁵² The manual provided a list of specific organizations that “have been the most active in encouraging their constituents to support Republican candidates.”⁵³ The list includes the Christian Coalition, which is described as a group which conducted “some of the most effective and hard-hitting mail and phone programs last cycle.”⁵⁴

A memorandum dated April 23, 1996, to RNC chairman Haley Barbour from RNC political director and head of campaign operations Curt Anderson indicates that the RNC routinely identified sympathetic outside groups and instructed its candidates to develop formal coalition plans with them, including the Christian Coalition.⁵⁵ The memorandum states:

Every [RNC] Regional Field Representative is in the process of putting together the definitive list of the 5 top reachable coalition groups in each state, and their approximate size. [Redacted] will be on this list for most states, as will the [redacted], and [National Right to Life]. Christian Coalition will make the list in about 1/2 of the states.

At virtually all of our field meetings we have put together day long meetings in which we bring the decision makers from the biggest coalition groups. We generally spend an hour

with each of them comparing notes on races....

While it has always been true that our coalition groups need direction on how they can best effect the outcome of elections, many of the larger groups are becoming increasingly sophisticated in their approach and they employ competent professionals who know how to make things happen.⁵⁶

Another internal RNC memorandum discussing “Outreach, Auxiliaries, Coalitions,” identified “five coalition organizations that have distinguished themselves and we have to pay special attention to,” including the Christian Coalition.⁵⁷

Still another internal RNC memorandum, dated March 4, 1996, to Barbour from Anderson, placed the Coalition leadership at the heart of the Republican Party’s strategy for victory in 1996.⁵⁸ In response to a request from Barbour, Anderson developed a list of persons who should be included in a select Republican leadership coalition of outside groups. Anderson recommended that Ralph Reed, the Coalition’s executive director, and Chuck Cunningham, the Coalition’s director of voter education be included, because they represent a group “that actually [has] troops in the field,” and “they can motivate, activate, and deliver.”⁵⁹ About 40 individuals were apparently evaluated by Barbour and other top RNC officials for inclusion in this select group; Ralph Reed was one of only two individuals who received unanimous support.⁶⁰ When Congressman Bill Paxon, head of the National Republican Congressional Committee (“NRCC”), was asked to “list the most important people or groups behind the Republicans’ effort to maintain control of the House” in 1996, he too listed the Christian Coalition.⁶¹

This evidence indicates that the RNC deliberately planned to work with independent groups to affect the outcome of the 1996 elections, and that the Christian Coalition was an integral part of this effort. The Minority attempted to clarify these documents by taking the deposition of Anderson and others named in them, but no one from the RNC or Coalition provided any interview or deposition on these matters.⁶²

Additional documents reveal that, during the 1996 election cycle, high-ranking officials of the RNC and the Christian Coalition had an ongoing working relationship. A December 15, 1995, internal RNC memorandum to Anderson from Jack St. Martin, RNC director of coalitions, discussed “Coalition Activities Week of Dec. 15.” St. Martin commented on his “constructive” meeting with Coalition Director of Voter Education Chuck Cunningham and National Field Director D.J. Gribbon, at which he “reassured” them the RNC would “work with them.”⁶³ (St. Martin recently resigned his RNC position and joined the Christian Coalition.⁶⁴)

A memorandum dated September 6, 1995, from St. Martin to RNC Chairman Haley Barbour concerned an upcoming speech by Barbour to the Coalition.⁶⁵ St. Martin advised Barbour to thank the Coalition for its contribution to the Republican victories in 1994. He suggested that Barbour tell the Coalition that “it is not simply a special interest group, but a vital part of the Republican base.” Finally, St. Martin recommended that Barbour encourage Coalition members “to run for national delegate slots.”

A memorandum to Anderson dated March 6, 1996, entitled, "Coalitions," categorized various outside groups according to their issues of concern and apparently discussed how the RNC could work with them.⁶⁶ The first entry states: "Family issues/Christian Coalition/Eagle Forum/Pro-Life groups/in-state PACS. In this community alone there are probably two dozen different organizations. What we ask them to do would be very different than what we ask pro-gun groups to do." This memorandum is additional evidence that the RNC was indeed asking groups like the Coalition to take actions on behalf of Republicans in connection with the 1996 elections.

In addition to RNC-Coalition communications, Drew and others have described ongoing communications and meetings between the Christian Coalition and the Dole campaign.⁶⁷ Drew writes:

"Scott has an ongoing relationship with Ralph," a Dole adviser said. According to Scott Reed, the two men talked once a week throughout the summer and fall [of 1996].⁶⁸

One series of communications took place around the Coalition's 1996 annual conference in which Reed allegedly sent written memoranda and spoke with Scott Reed, Dole campaign manager, and Paul Manafort, a key strategist in the Dole campaign, recommending that Senator Dole address the conference. After Senator Dole spoke to the conference, Ralph Reed reportedly sent Scott Reed another memorandum congratulating the Dole campaign on improving poll numbers and recommending "that Dole appear at an evangelical college in the South or a battleground Midwestern state. He specifically recommended Wheaton College in Illinois, Hillsdale College in Michigan, and several other schools. He then called Manafort."⁶⁹ None of these memoranda, however, was produced to the Committee. In fact, neither the Dole campaign nor the Christian Coalition produced a single memorandum exchanged between the two organizations during the whole of the 1996 election cycle.

Besides describing routine Coalition communications with the RNC and Dole campaign, Drew describes routine contacts between Ralph Reed and other key players in the Republican Party:

The relentlessly cheerful [Congressman] Bill Paxon [head of the NRCC] by mid-September was still predicting that the Republicans would pick up twenty House seats. In the course of our phone conversation, Paxon told me he had to ring off because Ralph Reed was waiting to see him. Then Paxon tried to pass it off as a once-a-year-or-so freindly visit. In fact, Reed told me later, he talked to Paxon during the election "a couple of times a month."

Ralph Reed also kept in touch with several of the consultants who worked with the Republican leadership and on congressional campaigns. His pollster, Vern Kennedy, also polled for Republican Jeff Sessions's campaign for the Alabama Senate seat. Others Reed kept in touch with were Frank Luntz, the thirty-three-year-old Republican pollster, and Joe Gaylord, the political consultant and close adviser to Newt Gingrich.⁷⁰

The Coalition also regularly attended weekly meetings held throughout 1996 at the headquarters of Americans for Tax Reform, attended by 50-70 conservative activists, Republican Party representatives, and candidates.⁷¹ Drew writes that these meetings often served as strategy sessions for the 1996 elections on behalf of Republicans, recounting, for example, group discussions of candidates and specific House and Senate races, and instances in which Republican candidates made formal presentations at the meetings and requested support for their election efforts. These meetings are described in more detail in Chapter 11 on Americans for Tax Reform.

Still other Republican Party connections during the 1996 election cycle emerged during the Republican National Convention, held August 12 to 15, 1996, in San Diego. Just before the convention, the media reported that Amway Corporation had donated \$1.3 million to the nonprofit San Diego Convention and Visitors Bureau (ConVis) which, in turn, had paid the money to the Family Channel to broadcast gavel-to-gavel, “unfiltered” coverage of the Republican Convention.⁷² The Family Channel is controlled by Pat Robertson.⁷³ After the Democratic National Committee filed an FEC complaint charging Amway with laundering an illegal corporate contribution to the Republican Party through ConVis, the plan was abandoned. The \$1.3 million was repaid to Amway, and the RNC instead used taxpayer funds to pay for five nights of air time on the Family Channel.⁷⁴ This convention coverage was not the first time that Robertson’s network carried programming favoring the Republican Party; in 1990, the Family Channel aired programming from the American Citizens’ Television, an effort associated with GOPAC and House Speaker Newt Gingrich.⁷⁵

The Coalition’s actions to support Republican candidates and the Republican Party in the 1996 elections was not a new development. As recounted in the FEC complaint against the Coalition described below, the Coalition has been helping Republican candidates in the last three election cycles. For example, the Coalition is alleged to have provided direct financial assistance to Senator Jesse Helms (R-NC). A \$14,000 Coalition check payable to “Christian Coalition of North Carolina” is dated October 30, 1990.⁷⁶ On the check is the notation “GOTV Calls State Project G/L 5710,” an apparent reference to a “get out the vote” telephone bank operation. The FEC complaint alleged that the Coalition acted in concert with Helms’s re-election campaign, and “made expenditures directly and/or through its state affiliate to make approximately 29,800 telephone calls as part of a get-out-the-vote telephone bank operation in connection with the November 1990 general election in North Carolina.”⁷⁷

Rather than provide direct financial assistance, the Coalition “rented” a mailing list of 36,000 of its supporters to Republican candidate Oliver North’s campaign during his 1994 Senate race in Virginia against Senator Chuck Robb. North allegedly paid \$5,131 for the list in the spring of 1994. Coalition communications director Arne Owens acknowledged the incident but asserted that the list was rented at fair market value.⁷⁸

In 1992, the Coalition apparently received a donation “earmarked” for the Bush presidential campaign. On July 23, 1992, John Wolfe, a business executive, wrote to Pat Robertson that “a very good friend of mine [Lyn Nofziger] tells me your group is very supportive of President Bush and that you will be doing a massive distribution of literature on his behalf.”

Wolfe wrote that he was advised that “you could use some financial help with that project for the President and therefore, on the recommendation of Lyn, I am pleased to send you a contribution of \$60,000.” Enclosed with the letter was a personal check in that amount dated July 23, 1992. In an August 3, 1996, interview, Nofziger acknowledged that he had known Wolfe for 30 years and recalled discussing the issue with him.⁷⁹

COALITION ACTIVITY IN STATE ELECTIONS

Although the Committee’s mandate focused on the 1996 federal election, the Coalition’s activities in state elections are relevant because they show a continuing pattern of partisan political activity. In 1991, Virginia Beach Republican Kenneth Stolle was supported by the Christian Coalition in his state Senate campaign against incumbent Democrat Moody Stallings. According to Judy Liebert, the Coalition’s former chief financial officer, the Coalition mailed thousands of Stolle campaign letters from its headquarters.⁸⁰ The Coalition advised that the local Republican committee paid \$4,742 for the mailing. In defending itself, the Coalition pointed out that state elections are not under the jurisdiction of the Federal Election Commission, and that state election law allows unlimited corporate contributions to state candidates. The Coalition asserted that it “simply functioned as a lettershop.”⁸¹

Despite its claims that it “simply functioned as a lettershop,” the Coalition appears to have provided financial assistance as well. A Coalition check in the amount of \$25,000 made payable to the 2nd District Republican Committee is dated November 12, 1991, one week after the Stolle-Stallings election.⁸² Reportedly, a factor in Stallings’s defeat was a “blitz” of negative television advertisements in the final week of the campaign -- bought by the 2nd District Republican Committee. Had the Stolle campaign purchased the ads, it would have been required to report the contributors. Interestingly, Pat Robertson’s son, Gordon Robertson, was the 2nd District Republican chairman at the time, and he refused to reveal the source of the money. A state police investigation of the matter ensued, after which the Norfolk commonwealth’s attorney determined that the party was not required to reveal the source of the ad money. The \$25,000 was characterized by a Coalition spokesman as a “one-time” contribution for “general party-building purposes.”⁸³

Similar to the “rental” of a Coalition voter list to Oliver North’s 1994 U.S. Senate campaign was the “sale” of a voter list to a Republican candidate in a Florida state race. A presentation at the 1993 Coalition “Road to Victory” conference by Max Karrer, Coalition state coordinator for North Florida, revealed how the Christian Coalition of Florida assisted a Republican candidate in winning a seat in the state legislature. According to Karrer, the Coalition used computerized membership lists of conservative churches to build a Christian voter data base. The list was then sold to the conservative candidate for five dollars. Karrer stated, “We were not allowed to give them away, so we charged him five dollars; but we printed labels for him of the Christian voters, which enabled him to put out direct mailings to the Christian voter, that he would not necessarily do to the general public. . . . You want to talk about stealth campaigns; it was quietly done, and they didn’t realize they were in trouble until it was too late.” Commenting on the Coalition’s influence among candidates, Karrer stated, “When someone wants to run for office, they come to the Christian Coalition. . . . It

gives you. . .tremendous lobbying power with the legislator because they think you have this huge bloc of votes that you can swing, though you can't necessarily.”⁸⁴

Distortion of candidates' positions in Coalition voter guides is not limited to federal elections. A Florida state circuit court barred the Seminole County Christian Coalition from distributing copies of its voter guide before the October 4, 1994 runoff election for the Seminole County Commission.⁸⁵ Adrienne Perry, Democratic candidate for Seminole County Commission District 2, had alleged in a lawsuit that the voter guide misrepresented her views on homosexual marriage. Perry claimed that her support for allowing homosexual partners to be included on health plans was misrepresented in the guide as a blanket approval of legalizing homosexual marriages. The Circuit Court judge ruled that the Coalition questionnaire sent to Perry and other candidates and the resulting voter guide did not allow for a “moderate view.” The judge stated, “It's either one way or another, and that's misleading. It doesn't represent Ms. Perry's position.”⁸⁶

Candidate endorsement also continues within local Coalition circles. In August 1997, Virginia State Delegate Jay Katzen, a Fauquier County Republican invited by the Coalition to lead a political training session in Fairfax County, urged members to work against Democratic gubernatorial candidate Don Beyer. Reportedly, Katzen referred to Beyer as a “dangerous opponent,” but praised Republican Governor George Allen and James Gilmore, Beyer's Republican opponent. “Don Beyer has promised. . .to reverse everything that you elected me and George Allen and Jim Gilmore to achieve,” Katzen told the Coalition activists. Mark Rozell, a political scientist at American University who wrote a book about the religious right, commented, “Jay Katzen's remarks should put to rest the argument about whether the Christian Coalition is really an arm of the Republican Party. . . .This is so explicit, it's incredible.”⁸⁷

FEC ACTION

In complaints filed with the FEC since February 1992, the Democratic Party of Virginia, and later the Democratic National Committee, alleged improper political activity by the Coalition.⁸⁸ These complaints led to an FEC investigation and subsequent suit against the Coalition in federal court. On July 30, 1996, the FEC, by affirmative vote of four of its members (two Democratic appointees joined by two Republican appointees), filed suit against the Coalition, alleging the organization improperly provided aid to Republican candidates.⁸⁹

The FEC complaint alleged, “During the campaign periods prior to the 1990, 1992 and 1994 federal elections, [the] Christian Coalition made expenditures, directly from its corporate treasury and/or through its subordinate state affiliates, to influence the election of candidates for federal office.”⁹⁰ Referencing examples of the Coalition's work with prominent Republican candidates such as former President George Bush, Senator Jesse Helms, former Senate candidate Oliver North and House Speaker Newt Gingrich, the FEC alleged that the Coalition spent money on voter guides and other get-out-the-vote efforts in conjunction with particular candidates' campaigns and engaged in expressly advocating the election or defeat of specific candidates. The complaint further stated that the Coalition consulted with candidates' campaigns before making the improper expenditures, which

are considered “in-kind contributions.”⁹¹ Corporations are prohibited by law from making contributions from corporate treasury funds to federal elections.⁹² However, corporations may legally engage in such activity through a separate, segregated political committee fund, subject to federal election law registration and reporting requirements.⁹³

The FEC complaint consists of three causes of action.⁹⁴ The first cause of action alleges violations of law for Coalition actions on behalf of the following candidates or campaigns:

- O Bush/Quayle campaign - The Coalition made expenditures for voter identification and get-out-the-vote efforts and for the preparation and distribution of approximately 28 million voter guides in connection with the 1992 election for president and vice president of the United States.⁹⁵
- O Jesse Helms - The Coalition made expenditures directly and/or through its state affiliate to produce and distribute approximately 750,000 voter guides in connection with Senator Helms’s November 1990 general election campaign and additionally made expenditures to make approximately 29,800 telephone calls as part of a get-out-the-vote telephone bank operation in connection with the November 1990 general election in North Carolina.⁹⁶
- O Oliver North for U.S. Senate Committee, Inc. - The Coalition made expenditures directly and/or through its state affiliate to produce and distribute approximately 1,750,000 voter guides in connection with the 1994 general election campaign in Virginia and additionally made expenditures for voter identification and get-out-the-vote efforts in connection with the 1994 general election campaign in Virginia.⁹⁷
- O Inglis for Congress Committee - The Coalition made expenditures directly and/or through its state affiliates for voter identification and get-out-the-vote efforts in connection with the 1992 general election in the Fourth District of South Carolina and also made expenditures to produce and distribute approximately 240,000 voter guides in connection with this election.⁹⁸
- O J.S. Hayworth for Congress - The Coalition made expenditures directly and/or through its state affiliates for voter identification and get-out-the-vote efforts in connection with the 1994 general election in the Sixth District of Arizona and also made expenditures to produce and distribute approximately 200,000 voter guides in connection with this election.⁹⁹

The second cause of action concerns the National Republican Senatorial Committee, “a national party committee dedicated to the election of Republican candidates to the United States Senate.” The FEC alleged that “[d]uring 1990, [the] Christian Coalition, acting in coordination, cooperation, and/or consultation with the NRSC, made expenditures directly and through its state affiliates to produce and distribute between five and ten million voter guides in seven states in connection with the November 1990 federal elections for the United States Senate.”¹⁰⁰

The third FEC cause of action alleges that “[The] Christian Coalition made corporate expenditures directly and/or through its state affiliates for public communications expressly advocating the election or defeat of clearly identified candidates for federal office.” It states that, for example, the “Christian Coalition, through its subordinate state affiliate in Montana, made expenditures in excess of \$250 during a calendar year for a two day conference open to the public held during January 1992. At this conference, Dr. Ralph Reed expressly advocated the defeat of United States Representative Pat Williams. Thus, the conference costs were independent expenditures by Christian Coalition in opposition to the candidacy of Representative Pat Williams.” It states that, in addition, the Coalition may have violated 2 U.S.C. Section 434(c) by failing to report the costs of the conference as an independent expenditure in opposition to the candidacy of Representative Pat Williams.¹⁰¹

Additionally, the third cause of action alleges that during 1994, the Coalition made expenditures in excess of \$250 during a calendar year for the preparation and distribution of a direct mail package entitled “Reclaim America” which included a scorecard and a cover letter signed by Pat Robertson. In the letter, Robertson asserted that the enclosed scorecard would be an important tool for affecting the outcome of the upcoming elections: “This SCORECARD will give America’s Christian voters the facts they will need to distinguish between GOOD and MISGUIDED Congressmen.” The scorecard listed and characterized many issues voted on in the Senate and House in 1993 and 1994. Each Member’s votes were reflected as a “-” or a “+”, followed by percentages. The scorecard stated: “A score of 100% means the Congressman supported Christian Coalition position on every vote. A score of 0% means the Congressman never supported a Christian Coalition position.” The FEC alleged that the mailed package together constituted express advocacy of “clearly identified candidates for federal office,” and constituted unreported independent expenditures, in violation of the law.¹⁰²

Finally, the third cause of action alleges that prior to the July 9, 1994 primary election in Georgia, the Coalition, through its subordinate state affiliate in Georgia, made expenditures in excess of \$250 during a calendar year for the preparation and distribution of a combination Congressional Scorecard and cover letter, which stated in part: “The only incumbent Congressman who has a Primary election is Congressman Newt Gingrich - a Christian Coalition 100 percenter.” The FEC alleged that the mailing constituted express advocacy of the re-election of Gingrich, constituting unreported independent expenditures in violation of the law.¹⁰³

The FEC asked the court to declare that the Christian Coalition violated 2 U.S.C. Section 441b and 434(c). The FEC further asked the court to enjoin the Christian Coalition from making similar corporate contributions and expenditures in violation of 2 U.S.C. Section 441b; and to enjoin the Christian Coalition from violating 2 U.S.C. Section 434(c) by failing to report its independent expenditures. Additionally, the FEC asked the court to assess an appropriate civil penalty against the Christian Coalition for each violation found by the Court to have been committed by the Corporation, not to exceed the greater of \$5,000 or the amount of the expenditure involved in the violation, and to grant such other relief as may be appropriate.¹⁰⁴ The FEC suit is ongoing.

CONCLUSION

The evidence shows that the Christian Coalition is closely tied to the Republican Party and functions as a partisan political committee. The Coalition has been led by persons with close ties to the Republican Party, received about \$64,000 in start-up funds from the National Republican Senatorial Committee, and is repeatedly identified in RNC documents as “a vital part of the Republican base.” Former Coalition officials have confirmed that the organization is closely aligned with the Republican Party and explained how the Coalition constructs its voter guides to favor the candidates the Coalition prefers. The fact that the two FEC Republican commissioners joined with their two Democratic counterparts in deciding to file suit against the Coalition supports the conclusion that the Coalition does indeed engage in election activity promoting specific Republican candidates.

The ongoing pattern of distortion of candidates’ positions as stated in Coalition voter guides and the above-cited examples of candidate endorsements provide evidence that the Coalition does not seek merely to inform and educate voters, but instead functions to elect specific Republican candidates to offices at all levels of government. Another disturbing tactic employed by the Coalition is the distribution of voter guides in selected churches the weekend prior to an election, thus making it difficult for candidates to correct any distortions of their positions. The fact that voter guides did not address the same issues in the same manner for each district, but instead attempted to portray the Coalition’s favored candidate in the most favorable light, amounted to candidate endorsement, not simply informing and educating the voter.

The Coalition voter guides also failed to list positions on all surveyed issues for all candidates, thereby precluding the voter from a full understanding of the candidates’ views on each issue. As discussed earlier, issues portrayed in the voter guides were reduced to sparsely worded “sound bites,” which condensed complex political issues into simple phrases, without explaining the varying degrees of difference among candidates’ positions. Apparently, the Coalition does not wish to fully inform its constituents of the candidates’ positions, preferring instead to slant voter guide issues in an effort to elect the Republican candidate preferred by the Coalition. In the Minority’s view, such tactics are employed because the Coalition fears that fully informed voters may not support the Coalition’s candidates.

The evidence indicates that the Coalition is a partisan Republican political committee, whose primary activity and major purpose is the election of Republican candidates to public office, and should not be granted IRS section 501(c)(4) “social welfare organization” tax exempt status. It is time for the IRS to reach a final decision on this matter. In addition, the FEC should continue its civil enforcement action to require the Coalition to stop making prohibited corporate contributions to federal candidates and to report independent expenditures to the FEC. More, the Coalition ought to register with the FEC as the political committee it is.

1. FEC v. Christian Coalition, Civil Action No. 96-1781 (U.S.D.C. District of Columbia), 7/30/96 (hereinafter “FEC Complaint”); FEC Statement of Reasons, Commissioner Aikens and Elliot, 1/24/96.
2. Letter from Senator Glenn to Chairman Thompson concerning 11 Minority-drafted subpoenas, 3/3/97.
3. Committee Subpoena to Christian Coalition, 7/30/97.
4. Letter from Christian Coalition, et al, to Committee re: Joint Statement of General Objections to Subpoenas, 9/3/97.
5. Sabato, Larry J. and Glenn R. Simpson. Dirty Little Secrets: The Persistence of Corruption in American Politics. New York: Times Books, 1996, pp. 109-110.
6. Sabato & Simpson, pp. 109-10; see also Drew, Elizabeth. Whatever It Takes. United States: Penguin Books USA Inc., 1997, pp. 24-25.
7. See Chapter 11 on Americans for Tax Reform.
8. Sabato & Simpson, pp. 110-111. See also Drew, p. 24.
9. Ralph Reed’s dictated response to Christian Coalition Chief Financial Officer Judy Liebert, re: monies received from the NRSC in 1991.
10. Sabato & Simpson, p. 111.
11. CRS Report, 95-421A, Comparison of 501(c)(3) and 501(C4) Organizations, 3/24/95, p. 2; 26 U.S.C. 501(c)(4). See also Chapter 9.
12. CRS Report, 95-421A, p. 1; see Chapter 9.
13. See Chapter 9.
14. See “Voter Guides In The 1996 Elections” section of this chapter.
15. Church & State, July/August 1996.
16. The Christian Coalition’s Specific Objections To Schedule A, p. 5.
17. Sabato & Simpson, p. 134.
18. Sabato & Simpson, p. 134.
19. Sabato & Simpson, p. 135.

20. Church & State, 11/94.
21. Ft.Worth Star-Telegram, 11/5/94.
22. Richmond Times Dispatch, 11/3/94.
23. Ft.Worth Star-Telegram, 11/5/94.
24. Drew, p. 26.
25. Gannett News Service, 11/8/96; Roll Call, 12/12/96; Drew, p. 160.
26. 1996 Christian Coalition Voter Guides - Georgia.
27. 1996 Christian Coalition Voter Guides - Iowa; Letter from Senator Harkin to Christian Coalition Director of Voter Education Chuck Cunningham, 4/25/96.
28. 1996 Christian Coalition Voter Guide for Presidential Race.
29. 1996 Christian Coalition Voter Guides - Alaska.
30. 1996 Christian Coalition Voter Guides - Massachusetts. In Mississippi, the same modifying language concerning the balanced budget issue that appeared in the Coalition's Massachusetts guide concerning Representative Joe Kennedy, was used by the Coalition in two congressional district voter guides, but not in the remaining three district guides. 1996 Christian Coalition Voter Guides - Mississippi.
31. Riverside (CA) Press Enterprise, 11/2/96. The guide indicated that Representative Bono supported a ban on partial-birth abortions, and that his opponent had not responded to the Coalition's survey. According to Stoermer, Representative Bono's responses to other abortion-related questions in the Coalition's questionnaire indicated that he supported abortion in some circumstances. For example, Stoermer indicated that Representative Bono did not answer questions about whether he supported Roe v. Wade, the landmark U.S. Supreme Court decision giving women the right to seek an abortion, or the right to abortion on demand during the first trimester of pregnancy. Representative Bono had also voted for an amendment in August 1995 that would have prevented states from denying the use of Medicaid funds for abortions, except in cases where the pregnancy would endanger the mother's life. Riverside (CA) Press Enterprise, 11/2/96.

Stoermer had resigned in a dispute with the Coalition over the exclusion of a third party candidate from the same Coalition voter guide. Information concerning American Independent Party candidate Donald Cochran, who was also running against Representative Bono, was excluded from the voter guide. The California Christian Coalition had blocked Stoermer from including Cochran in the voter guide because of a national policy to feature only viable candidates. Stoermer said neither Representative Bono nor his Democratic candidate could claim to represent family values because both had been divorced and supported abortion rights, while

Cochran had never been divorced and opposed abortion. When Cochran ran against Democrat Steve Clute in 1994, he captured 6.4 percent of all ballots cast in the race. Press Enterprise, 10/9/96.

32. Letter from Norma Paulus to Ralph Reed, 11/27/95.

33. Norfolk Virginian-Pilot, 8/4/97.

34. Ethnic Newswatch, Baltimore Jewish Times, 9/15/95; Associated Press, 9/6/95.

35. Ethnic Newswatch, 9/15/95; Associated Press, 9/6/95.

36. Church & State, 10/95, p. 8.

37. Church & State, 10/95, p. 9. Campbell also made a television commercial on Foster's behalf, in her capacity as Louisiana Coalition Director; but the ad was allegedly pulled when the national Coalition office learned of it.

38. Church & State, 10/95, p. 9. Apparently Coalition officials were concerned about media scrutiny, as guards were posted at the doors to remove anyone not personally approved by the caucus leader.

39. Church & State, 10/96, p. 9.

40. Church & State, 10/96, p. 9.

41. Church & State, 10/96, p. 9.

42. Church & State, 10/96, p. 9.

43. Washington Post, 9/13/96, p. 20.

44. New York Times, 9/18/97.

45. Washington Post, 9/18/97.

46. New York Times, 9/18/97; Washington Post, 9/18/97.

47. Washington Post, 9/13/96, p. 20.

48. St. Louis Post-Dispatch, 3/20/96.

49. Dole Campaign Memorandum from Judy Haynes to Jill Hansen, 12/14/95.

50. Drew, p. 23.

51. Associated Press, 7/7/96.

52. See Chapter 10; Exhibit 2367: Coalition Building Manual, authored by Curt Anderson, R01821-49.
53. Exhibit 2367, at R01841.
54. Ibid. at Exhibit 2367, at R01847.
55. Exhibit 2363: memorandum dated 4/23/96 from RNC political director and head of campaign operations Curt Anderson to RNC chairman Haley Barbour, regarding "Nuttle's Coalition Plan," R06060-62.
56. Exhibit 2363.
57. Exhibit 2353: undated internal RNC memorandum from "Blaise" to "Pat," regarding "Outreach, Auxiliaries, Coalitions," R51299-30.
58. Exhibit 2365: memorandum dated 3/4/96 from RNC political director and head of campaign operations Curt Anderson to RNC chairman Haley Barbour, regarding "Group of 12, or Council of Trent, or Whatever," R006050.
59. Exhibit 2365.
60. Hearing exhibit 2366: untitled and undated document tallying support for, opposition to and comments by RNC officials on proposed members in a coalition of independent group leaders, R021559-60.
61. Drew, p. 14.
62. For example, in early August 1997, Anderson, through his attorney, indicated he would voluntarily appear for a deposition. Subsequently, he changed his mind, and at the request of the Minority, the Majority issued a Subpoena with a September 18 return date. Anderson could not be located immediately and the subpoena was served on September 19, one day after the return date. Anderson's attorney claimed the subpoena was invalid, and the Majority refused the Minority's request to issue a second subpoena to Anderson. See also Part 7.
63. Memorandum from RNC coalitions director Jack St. Martin to RNC political director and head of campaign operations Curt Anderson, 12/15/95.
64. U.S. Newswire, 11/20/97.
65. Memorandum from RNC coalitions director Jack St. Martin to RNC Chairman Barbour, 9/6/95.
66. Hearing exhibit 2362: memorandum from "Hopper" to RNC political director and head of campaign operations Curt Anderson, with a copy to RNC coalitions director Jack St. Martin, 3/6/96, regarding "Coalitions," R056245.

67. See, for example, Drew, pp. 14, 105-7, 160-62; Associated Press, 7/7/96 (Robertson and Reed met with Dole for 40 minutes on 6/27/96.).
68. Drew, p. 106.
69. Drew, pp. 161-62.
70. Drew, pp. 164-65.
71. See Drew, p. 6.
72. See, for example, San Diego Union-Tribune, 8/9/96, p. B1.
73. See, for example, San Diego Union-Tribune, 8/9/96, p. B1.
74. San Diego Union-Tribune, 8/14/96, p. B1; Los Angeles Times, 8/13/96, p. A18; Newsday 8/8/96, p. B4.
75. Boston Globe, 11/22/96, p. A1; The Village Voice, 8/6/96, p. 23; Washington Post, 1/7/97, p. A1.
76. \$14,000 Christian Coalition check to Christian Coalition of North Carolina, 10/30/90.
77. FEC Complaint.
78. AP/Baltimore Sun, 6/5/97; Universal Lists Billing invoice #1010, 3/23/94.
79. Washington Post, 8/4/96; Associated Press, 8/3/96.
80. Norfolk Virginian-Pilot, 8/4/97.
81. Norfolk Virginian-Pilot, 8/1/97.
82. Christian Coalition \$25,000 check to the Second District Republican Committee, 11/12/91.
83. Norfolk Virginian-Pilot, 7/27/97.
84. Freedom Writer, April 1994.
85. Orlando Sentinel, 9/17/94.
86. Orlando Sentinel, 9/29/94.
87. Washington Post, 9/28/97.
88. FEC Complaint, p. 2.

89. FEC Complaint, p. 5. At the time of the vote, one position on the Commission was vacant, and another member was not present. An earlier vote to require the Coalition to register as a political committee did not pass, as it was opposed by the two Republican appointees. They contended that within the meaning of the law, the Coalition's "major purpose" was not the election or defeat of a federal candidate. FEC Statement of Reasons, Commissioners Aikens & Elliot, 1/24/96, pp. 1, 6.
90. FEC Complaint, p. 6.
91. FEC Complaint, pp. 5-12.
92. FEC Complaint, p. 5; 2 U.S.C. §441b.
93. FEC "Statement of Reasons," Commissioners Thomas, McGarry, & McDonald, 7/30/96, p.2.
94. FEC Complaint, pp. 6-10.
95. FEC Complaint, p. 7.
96. FEC Complaint, pp. 7-8.
97. FEC Complaint, p. 8.
98. FEC Complaint, p. 9.
99. FEC Complaint, p. 9-10.
100. FEC Complaint, p. 10.
101. FEC Complaint, pp. 10-11.
102. FEC Complaint, pp. 11-12.
103. FEC Complaint, p. 12.
104. FEC Complaint, pp. 12-13.